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GERALD ARMSTRONG and THE
6 GERALD ARMSTRONG CORPORATION

FILED

JAN 20 1995

By HOWARD HANSEN Deputy
J. NAJIE MARIN COUNTY CLERK

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF MARIN

RECEIVED

JAN 20 1995

12 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
13 religious corporation,)
14 Plaintiff,)
15 vs.)
16 GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION,)
17 a California for-profit)
corporation; DOES 1 through 100,)
18 inclusive,)
19 Defendants.)
20

No. 157 680 **HUB LAW OFFICES**

**DECLARATION OF FORD GREENE
RE ARMSTRONG'S OPPOSITION
TO MOTION TO COMPEL
FURTHER DEPOSITION
RESPONSES**

*conformed copy to
Benz 1/20/95
HC*

Date: 1/27/95
Time: 1400
Dept: Discovery Referee
Trial Date: May 18, 1995

21 FORD GREENE declares:

22 1. I am an attorney licensed to practice law in the Courts
23 of the State of California and am the attorney of record for
24 Gerald Armstrong, defendant herein.

25 2. From February 1989 through June 1991 and then from July
26 1991 through May 1994 I was the attorney of record for Vicki
27 Aznaran, plaintiff in Federal litigation against various
28 Scientology corporations. Through my representation of Ms.

1 Aznaran I became familiar with her signature, having many times
2 faxed and otherwise transmitted written declarations and other
3 communications back and forth between us.

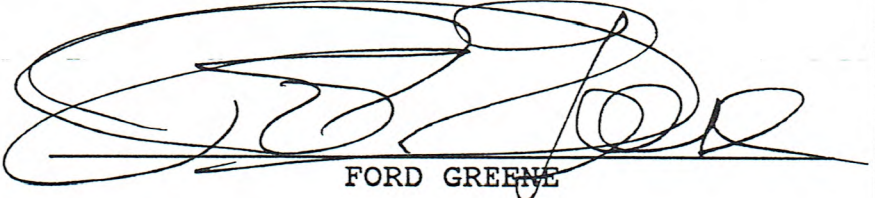
4 3. Attached hereto as Exhibit A is a declaration signed by
5 Vicki Aznaran on May 31, 1988 in litigation between Scientology
6 and Bent Corydon, author of the book entitled, L. Ron Hubbard:
7 Messiah or Madman? I recognize the signature on this document as
8 that of Vicki Aznaran.

9 4. Attached hereto as Exhibit B is a declaration signed by
10 Vicki Aznaran on July 19, 1990.

11 5. I also represent Robert Vaughn Young and recognize his
12 signature. Attached hereto as Exhibit C is a declaration signed
13 by Robert Vaughn Young on October 25, 1993.

14 Under penalty of perjury pursuant to the laws of the State of
15 California I hereby declare that the foregoing is true and correct
16 according to my first-hand knowledge, except those matters stated
17 to be on information and belief, and as to those matters, I
18 believe them to be true.

19
20 Executed on January 20, 1995, at San Anselmo, California

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24 FORD GREENE

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DECLARATION OV VICKI AZNARAN

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3 I, VICKI AZNARAN, do hereby declare as follows:

4 I am over the age of eighteen and if called to the stand and
5 sworn under oath I could competently testify as follows:

6 1. I was involved with the Church of Scientology from 1972
7 to April 1987. During this time I held various management roles
8 within the Church of Scientology. In 1982 I became an official
9 for the Religious Technology Center which controlled the use of
10 Scientology trademarks. At one time I was head of this entity.

11 2. Prior to my tenure at RTC, I was a Commodore Messenger
12 in Clearwater, Florida.

13 3. Around 1981 and into 1982, Scientology disbanded the
14 Guardian's Office as members of the same had been arrested for
15 theft of government documents and obstruction of justice.

16 4. I personally read dispatches setting forth L. Ron
17 Hubbard's plan that Scientology should separate itself from the
18 acts that were done in the Guardian's Office and therefore the
19 Guardian's Office should be disbanded.

20 5. Your declarant was selected to go to Los Angeles and
21 take over the United States Guardian's Office for purposes of
22 reforming it and disbanding it. Pursuant to said plan, I reviewed
23 many of the Scientology documents seized by the FBI. The accuracy
24 and legitimacy of these documents were confirmed to me by other
25 Scientology officials, including Norman Starkey and staff members
26 of the Guardian's Office who were on staff at the time documents
27 were seized. These informants included Joe Lisa, Tom Ritchie,
28 and Laurie Zurn.

1 6. While the Guardian's Office was disbanded, the same was
2 done in "name" only. The role was assumed by the Office of
3 Special Affairs International located in Los Angeles at the old
4 Ceders Complex.

5 7. Scientology still ran covert operations that included
6 planting people as spies, bugging of rooms and raiding people's
7 garbage, particularly opposing legal staff, looking for
8 information.

9 8. The Office of Special Affairs International has a public
10 relations division which subscribes to a "clipping service" and
11 maintains files concerning publicity and articles generated
12 concerning the Church of Scientology.

13 9. The Office of Special Affairs International further has
14 a legal division which monitors all legal cases involving the
15 Church of Scientology and maintains records relating thereto.

16 10. In 1984 I attended a meeting of high Church of
17 Scientology officials, including David Miscavige, Starkey, and
18 Marty Rathburn. At this meeting Mr. Miscavige said that something
19 had to be done about "squirrels." "Squirrels" is a Scientology
20 term for people who have left Scientology and offer an altered
21 version of Scientology technology to the public. I personally
22 heard Mr. Miscavige discuss getting their "field people" to go out
23 and beat up squirrels. (In Scientology, field people are
24 Scientologists not employed specifically by the Church.) These
25 instructions were given to Warren McShane. Plans were discussed
26 as to who would do it.

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2 11. In late 1986, I saw a directive concerning planting
3 someone close to Bent Corydon in order to obtain the manuscript of
4 his book that he was writing on L. Ron Hubbard.

5 12. In 1982, I listened to a tape of L. Ron Hubbard
6 outlining a plan, the purpose of which was to take over control of
7 the Missions so that Scientology could control the Mission money
8 and assets. It would also give Scientology the power to control
9 and dictate activities of any Missions. Prior to this, Missions
10 were generally autonomous.

11 13. As part of this plan, the purpose of the plan was not to
12 be disclosed to the Mission holders. A sales pitch was created to
13 falsely advise Mission holders that the new articles and by-laws
14 would make their Missions better and more independent.

15 I declare under penalty of perjury that the above is true and
16 correct to the best of my belief.

17 Executed on May 31, 1988, at Dallas, Texas.

18
19 Vicki Aznarán
20 Vicki Aznarán
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DECLARATION OF VICKI J. AZNARAN

I was involved with the Church of Scientology ("Scientology") for approximately 15 years. I submit this declaration on personal knowledge of the facts contained herein and if called upon as a witness I could and would competently testify thereto.

In 1978, after approximately four years as staff members, my husband and I joined the Sea Organization. From 1978 to early 1987, my husband and I worked most of our waking hours, with very few days off, at our various assignments within Scientology. I eventually became President of Religious Technology Center and, supposedly, the top "ecclesiastical" authority within Scientology. Richard was a high-level security officer. During this period my husband and I became intimately familiar with the structure and activities of various Scientology organizations. Among other things, I was briefed on and sometimes a participant in meetings involving litigation tactics and various means used to attack and fight "enemies" of Scientology. In numerous instances I was in the chain of command for approval for such activities. The legal strategy of Scientology and the existence of numerous potential legal problems, some of which are set forth below, were known to me when I was a staff member in Scientology.

Enemies of Scientology are deemed to be "suppressive persons" ("SPs"). One becomes a "suppressive person" by doing a suppressive act, such as suing Scientology as a litigant or lawyer. In the jargon of Scientology, when one is "declared" this means that one has been declared a "suppressive person" and,

therefore, may be harassed, hurt, damaged or destroyed without regard to truth, honesty or legal rights. It is considered acceptable within Scientology to lie, cheat, steal and commit illegal acts in the name of dealing with a "suppressive person."

This practice or policy is sometimes referred to as the policy of "fair game." In the jargon of Scientology, a person who is "declared" is understood to be a suppressive person. This means that the person is "fair game." The fair game policy was issued in the 1960s. It was never cancelled. A document was issued for public relations reasons that purportedly cancelled "fair game"; however, that document stated that it did not change the manner of handling persons declared "SP." In reality, the purported cancellation of fair game is at most a matter of semantics. Enemies of Scientology are treated as "fair game."

David Miscavige was the Chairman of the Board of Author Services Inc., ("ASI") in 1984 and 1985. ASI was incorporated to be the funnel through which profits from Scientology were channelled to Hubbard and, therefore, it was very important within Scientology. Miscavige represented Hubbard in all aspects of controlling Scientology. He attended regular meetings with myself and other top officials of Scientology organizations to review the status of all Scientology's activities including its litigation and dirty tricks campaigns against Scientology's enemies.

At one meeting in 1985 Miscavige told those present that all of Scientology should be more aggressive in their fair game attacks upon and injuries inflicted on Scientology's

enemies, especially squirrels. At that time Bent Corydon was a hated squirrel who vexed Scientology's leadership by his refusal to give up his outspoken position. He had been in litigation with Scientology for several years and refused to fold.

Although I never heard Miscavige order an attack against Corydon by name I knew and believe that everyone at that meeting knew that Corydon was included in Miscavige's directive because he was one of the best known and most troublesome defectors from Scientology.

Similarly, there could be no doubt that Miscavige meant that all types of attack be used, including physical attacks, defamation, and efforts to cause Corydon to go into bankruptcy.

Because of my position and the regular reports that came across my desk I know that throughout my presidency of RTC that fair game actions against enemies were commonplace. In addition to the litigation tactics described below, fair game activities included burglaries, assaults, disruption of enemies' businesses, spying, harassive investigations, abuse of confidential communications in parishioner files and so on. I specifically recall seeing one report regarding attacks against Bent Corydon after Scientology became aware that he was writing a book against Hubbard.

Other Hubbard writings encourage Scientologists to pursue litigation purely for harassment without regard to the merits of a claim to cause enemies to fold. Hubbard's writings state:

"The purpose of the suit is to harass and discourage rather than to win... The law can be used very easily to harass, and...will generally be sufficient

to cause [the enemy's] professional decease.
If possible, of course ruin him utterly."
Hubbard, "Magazine articles on Level O
Checksheet" American Saint Hill Organization
1968. A true copy of the excerpt from "Magazine
Articles on Level O Checksheet" is attached
hereto as Exh. ___.

Pursuant to this statement it has become the practice of Scientology's management to use litigation for harassment and to cause the financial ruin of adversaries as part of the fair game policy. This is made even worse by the fact that Scientology has, in name only, many "independent corporation."

The false representations that the numerous Scientology corporations are independent entities permits Scientology to harass its enemies by filing multiple lawsuits all directed by the same people all raising the same issues against the same defendants, while their lawyers fraudulently claim that the entities they are representing are independent. At the same time Scientology makes it a practice to refuse to produce almost all discovery, with the objective of increasing the litigation costs and causing delay. Furthermore Scientology often resorts to the destruction of evidence. I know this on personal knowledge because I participated in the destruction of files of ex-Scientologists who were in litigation with the Church.

Although Author Services Inc. (ASI) has never to my knowledge appeared on any command chart distributed to Scientologists, ASI is an integral part of Scientology and was for some time the controlling entity over all of Scientology along with RTC. Some of the facts on which I base this statement are stated in the next few paragraphs.

ASI was incorporated at about the same time as the massive restructuring of all Scientology organizations by high ranking Scientologists. The incorporators and original officers were all Scientologists, and ASI was specifically created to be the entity through which Hubbard could, and did, exercise control over Scientology money and receive huge payments.

At the October 1982 Mission Holders' Conference in San Francisco, the mission holders were ordered to increase their weekly payments (called "tithes") from 10% to 15% of their gross income. The additional 5% was to be used for a massive public relations campaign to increase the publicity for Hubbard's science fiction books. This was part of an overall plan to dramatically increase the visibility of Hubbard's name so that the market would be more receptive to a new public relations blitz promoting DIANETICS, the first stage in the selling of enormously expensive Scientology counselling and courses. The 5% payment increase was ordered by and its use controlled by ASI with the aid of Bridge Publications Inc. ("BPI").

The Scientology Managing Agents (Hubbard, Miscavige, Starkey, Spurlock and their handmaiden organizations; the Commodore's Messenger Organization, the Sea Organization, ASI, RTC, CSC and SMI) had de facto controlling power over all Scientology entities through the exercise of the coercive threat of the fair game policy. It was this threat that kept most Scientologists in line. This power could be maliciously exercised as, for example, at the Mission Holder's Conference of 1982 when a mission holder named Gary Smith was summarily

declared a suppressive person (thus subjecting him to fair game) because he refused to move from a rear seat in the conference room to a front seat.

ASI claims to represent not only Hubbard but other writers but its only real motive and activity is the promotion of Hubbard's writing, the expansion of Scientology and personal aggrandizement and power of the personalities who control Scientology. The only other writers it represented at all prior to my departure from Scientology in 1987 are those included in the annual volume of new writers of science fiction called Writers of the Future. This was its only non-exclusively Hubbard project and this project was mandated to be implemented by Hubbard to promote him as a patron of the arts.

As part of their attempt to expand and complete their control of Scientology and to gain control of valuable assets belonging to the missions, the managing agents ordered the independently incorporated missions to adopt new Articles and By-laws prepared by them under which the missions would have to submit to control by the managing agents acting principally through the Sea Org, RTC, CSI, and SMI, and the Commodore's Messenger Organization. While most missions succumbed to this power play, some, such as the Church of Scientology Mission of Riverside (COSMOR), under the leadership of Bent Corydon, did not.

From 1984 through early 1987, I was President of Religious Technology Center (hereinafter "RTC"). As President of RTC and a Sea Organization member, I attended many meetings concerning the

numerous legal actions involving Scientology organizations. During this time period, I had personal access to all legal documents having to do with RTC. I received a report every day on my computer that included a synopsis of each ongoing legal case involving Scientology. I received, or so I was told, copies of every major motion filed in cases involving Scientology, I was on the "approval lines" for legal documents dealing with RTC. During this time period, I had the option of attending legal meetings although some were mandatory. I attended many litigation meetings and became generally aware of Scientology's dirty tricks and legal maneuvers. On specifics, I frequently deferred to in-house and outside counsel, however, at least in theory, I was the head of RTC and had access to any business or litigation "secrets" of Scientology.

It is the stated policy and practice of Scientology to use the legal system to abuse and harass its enemies. This crude, fundamental directive of Scientology is no secret. The policy is to do anything and everything possible to harass the opposing litigant without regard to whether any particular motion or maneuver is appropriate or warranted by the facts or applicable law. That policy was followed in every legal case I was involved with or learned about while a member of the Sea Organization. The management of Scientology consistently expressed and demonstrated a complete disdain for the court system viewing it as nothing more than a method to harass enemies. Some examples of this are set forth below.

During litigation between Gerald Armstrong and Scientology,

which was before Judge Breckenridge of Superior Court for Los Angeles County, the court ordered the production of Armstrong's pre-clear ("PC") folders. These are files maintained by Scientology on those who submit to interrogation sessions in a process called auditing. During the course of that litigation I was ordered to go through Armstrong's folders and destroy or conceal anything that might be damaging to Scientology or helpful to Armstrong's case. As ordered, I went through the files and destroyed contents that might support Armstrong's claims against Scientology. This practice is known within Scientology as "culling PC folders" and is a common litigation tactic employed by Scientology.

During other litigation in Los Angeles known to me as the Wollersheim case, I was told that the judge had ordered the production of Wollersheim's folders. As ordered, I "culled" these files. In other words, I removed contents that might have been damaging to Scientology or support Wollersheim's claims against Scientology. For example, I removed evidence of events involving his family, the anguish this caused him, evidence of disconnection from family and evidence of fair game.

I was involved in numerous meetings concerning what is known to me as the Christofferson case in Portland, Oregon. This case was tried twice. In the first case, a Scientology witness by the name of Martin Samuels was coached and drilled for hours on how to lie convincingly or avoid telling the truth. Before or during the second trial he admitted to this course of conduct. In this litigation, a Scientologist by the name of Joan Shriver produced

responsive documents that may have been incriminating. This was a serious breach of policy for which she was punished. These documents were ordered produced on such short notice that apparently files were not thoroughly "culled." In another case, an attorney was severely criticized and almost fired for failing to properly coach and feed the desired answers to Heber Jentzsch. Mr. Jentzsch was, for public relations reasons, the purported head of the Church of Scientology International. During his deposition, Mr. Jentzsch was unable to answer fundamental questions concerning the management of Church of Scientology International.

In November, 1985, I was present at a meeting whereat Earle Cooley, a Scientologist lawyer, Lyman Spurlock and Norman Starkey, all high ranking Scientologists, announced that they were going to contact Judge Mariana Pfaelzer. Earlier that day Judge Pfaelzer had denied a Scientology motion for a temporary restraining order. After losing on the application there was a meeting to determine what to do about the situation. At the meeting Mr. Cooley had a file that purportedly contained background and personal information on Judge Pfaelzer. During the meeting Mr. Cooley and others announced that they were going to attempt to meet with Judge Pfaelzer that evening, at her house if necessary, concerning the litigation in which the temporary restraining order had been sought. Thereafter, Mr. Cooley and two others left with their file on Judge Pfaelzer. They returned several hours later at which time I was told that their attempts to contact Judge Pfaelzer had been unsuccessful.

In late 1979 and early 1980, there was a massive document destruction program undertaken to destroy any evidence showing that L. Ron Hubbard ("LRH") controlled Scientology. I participated in this activity in Clearwater, Florida and am informed that there was also intensive document destruction at facilities in Gilman Hot Springs, California. From at least that point onward there was a continuous effort to hide or destroy any evidence of Hubbard's control. For example, during an IRS investigation in 1984 and 1985, while in bed with pneumonia, I was ordered out of bed by Norman Starkey who told me that they had received a tip from a Los Angeles Police officer advising them of a pending IRS raid in Los Angeles. Mr. Starkey ordered me to go to a computer facility and insure that all information on the computers in Los Angeles that might show Hubbard's involvement and control of Scientology's money was destroyed except for one copy of each document. These copies were to be saved on computer discs which were to be hidden in secure storage places. At the time I was also instructed to destroy anything that would show the control of Mr. Starkey or Mr. Miscavige over Scientology.

I have been informed and believe that an improper affidavit was filed in a case brought by L. Ron Hubbard, Jr. in Riverside, California. The circumstances were as follows: The document purported to be an affidavit of L. Ron Hubbard. The signature of Hubbard was purportedly notarized by David Miscavige. It is my understanding that this affidavit caused the case to be dismissed. Subsequently, I was told by Pat Broeker, who had been

living with Hubbard at the time, and by Miscavige, that Miscavige had not seen Hubbard between 1980 and Hubbard's death in 1986. Accordingly, the affidavit was apparently signed, notarized and dated during a time period when Hubbard was in seclusion and not seen by the person who purportedly notarized the signature of Hubbard.

In or about 1981, while working in a Scientology organization known as the Guardian's Office, I had access to and observed various written and oral communication pertaining to illegitimate activities participated in by the Guardian's Office. The Guardian's Office attempted to infiltrate both governmental and private agencies including the IRS, the Department of Justice, and the American Medical Association and the National Institute of Mental Health. The purpose of this was to steal documents pursuant to Hubbard's "Snow White" program. The goal of this program was to eliminate any negative reports about Hubbard and Scientology that may have been held by these various agencies.

While involved in Scientology I became aware of various operations directed against an author who had written a negative book about Scientology. The author, Paulette Cooper, was subjected to various forms of harassment. One operation included an attempt to frame her. A false bomb threat was written. Scientology agent lifted a fingerprint from Cooper's apartment. These fingerprints were then transferred to the bomb threat letter. Ms. Cooper was subjected to an investigation and was not cleared until an FBI raid resulted in the seizure of Scientology

documents that exposed the operation as a frame-up. There was at least one other operation directed against Ms. Cooper. The substance of it was to plant a boyfriend to reinforce and play upon her suicidal tendencies in the hopes that she would commit suicide.

In 1976 and 1977, the then Mayor of Clearwater, Florida, Gabe Cazares was involved with litigation against Scientology. Arrangements were made to have an attorney by the name of Merrill Vanniere, a Scientologist, represent Mr. Cazares and sabotage his case. This plot was also exposed by documents obtained in an FBI raid of a Scientology facility. Also, in response to Mr. Cazares' litigation against Scientology, an attempt was made to implicate Mr. Cazares in a staged hit-and-run accident.

During the time period of my involvement with Scientology, I also learned of various attempts to influence judges or force their removal from cases. For example, a private investigator named Dick Bast obtained a statement from a prostitute concerning involvement with a certain judge in Washington, D.C. who was sitting on a Scientology case. This was then publicized. The judge did not continue on the case. The same investigator, Dick Bast was also hired for the purpose of attempting to force the removal of a judge in Tampa, Florida. This involved what I know as the Burden case, which was civil litigation brought by attorney Michael Flynn. Dick Bast secured a yacht and attempted to get the judge on board for the purpose of filming him under compromising circumstances. The judge declined to go yachting and the operation was unsuccessful. Approximately \$250,000.00

was spent on the operation.

I have been informed by Mark (Marty) Rathbun, a high ranking Scientologist, that his private investigator, Gene Ingram, "fed" a confession to Ala Tamimi when visiting him in an Italian prison. This false confession was, in substance, that Tamimi had been involved in a bad check scam involving an account of L. Ron Hubbard. This false confession implicated attorney Michael Flynn in the check scam. Michael Flynn was at the time considered a major enemy of Scientology because he represented numerous clients with claims against Scientology. This purported confession was used to slander and attack Michael Flynn. Michael Flynn has also been sued by Scientology as part of its "strategy" for handling enemies.

During an IRS criminal investigation in the 1984 to 1985 time period, the IRS ordered production of various communications between Hubbard and Author Services, Inc. (ASI). The ASI staff worked literally day and night for several days reviewing documents so that unfavorable documents could be destroyed or otherwise concealed from the IRS. Lyman Spurlock and Marion M. Dendue, Scientologists involved in this operation, informed me of this operation. Also during this IRS investigation, my husband, Rick Aznaran, was ordered to remove and conceal any incriminating documents from certain locations. He was also directed to make the computer network "raid proof." This involved creating a system where incriminating documents could be deleted from computer storage rapidly and before the IRS could obtain control over the computers.

In 1985, I attended a conference on "squirrels" attended by Miscavige, Starkey, Spurlock, and McShane, members of top management, and others. In Scientology jargon, "squirrels" are people who use or practice some procedures also used by Scientology but who do not submit to the total control of the Scientology organization and, perhaps most importantly, who do not pay a percentage of their auditing or counseling fees to Scientology. At this meeting, David Miscavige ordered that public Scientologists be organized and motivated to physically attack squirrels and disrupt their operations. This was stated to be pursuant to the standard guidelines of Scientology. Pursuant to such directives, efforts were undertaken to intimidate and disrupt these persons and their organizations.

I declare under penalty of perjury that the above is true and correct to the best of my belief.

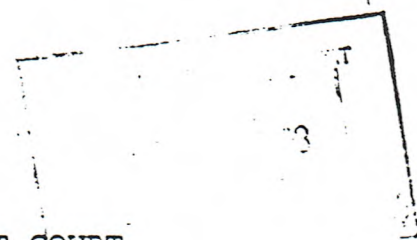
Executed on July 19, 1990 at ^{Dallas}~~Los Angeles~~,
California, TX. PA

Vicki J. Aznaran
VICKI J. AZNARAN

[Signature]
NOTARY PUBLIC

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY)	Case No. CV 91 6426 HLH (Tx)
INTERNATIONAL, a California)	
non-profit religious)	DECLARATION OF ROBERT VAUGHN
organization,)	YOUNG
)	
Plaintiff,)	Trial Date: Not set
)	Motion Cut off: Not set
vs.)	Discovery C/off: Not set
)	
STEVEN FISHMAN AND UWE GEERTZ,)	
)	
Defendants.)	

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DECLARATION OF ROBERT VAUGHN YOUNG

I, ROBERT VAUGHN YOUNG, declare as follows:

PURPOSE OF THIS DECLARATION

1. I have been retained as a consulting expert by counsel for defendant Dr. Uwe Geertz in the Church of Scientology International v. Steven Fishman, et al. litigation. I make this declaration in support of Dr. Geertz's several motions for summary judgment and in particular in response to the Declaration of Lynn Farny on issues relating to Fair Game and the Church of Scientology's deeply imbedded adherence to the doctrine that persons such as Dr. Geertz who have been labeled "Suppressive Persons" or enemies of Scientology should and must be harassed through any means possible, particularly the judicial system, to punish them for having criticized Scientology. I will summarize the basis for the information in this Declaration. Then I will address the issues pertinent to the pending motions. Finally, I will set forth my involvement with Scientology, which is the basis for the information contained in this Declaration in detail.

2. The matters set forth herein are of my own personal knowledge and if called to testify, I could and would testify competently thereto.

OVERVIEW OF MY ASSOCIATION WITH SCIENTOLOGY

3. I was a member of an organization calling itself the Church of Scientology for approximately 20 years between 1969 and 1989. For all but the first few months of my involvement with that organization I was an employee of the Church of Scientology. For about fifteen of those over twenty years, I lived communally

1 in the organization's facilities. I completed what Scientologists
2 consider to be one of its most confidential levels of personal
3 counseling. I acquired extensive information and training in the
4 techniques and methods used by people calling themselves
5 Scientologists. I have worked directly with every phase and
6 aspect of Scientology from introductory levels to the highest
7 management echelons.

8 4. In my various capacities, I have worked directly with
9 Scientology organizations and staff members in at least a dozen
10 countries. Materials which I authored were used in every
11 Scientology organization between 1969 and 1989.

12 5. I learned about the intricate Scientology corporate
13 structures and how they are interrelated. I am familiar with the
14 "secular" arms of Scientology. These are groups which do not
15 appear on the surface to be related to the Church of Scientology
16 but are in fact operated by the Scientology hierarchy.

17 6. For nearly all of my 20 years, I handled public
18 relations (PR) for L. Ron Hubbard ("Hubbard") and/or the Church
19 Scientology. I have dealt with every aspect of Scientology PR,
20 from the simplest actions to dealing with international media. I
21 have read and been privy to every level of documentation,
22 including Hubbard's most personal and private writings and the
23 "upper level" materials. I have handled every type and phase of
24 the media on behalf of Hubbard and Scientology. On many occasions
25 I have been a national spokesman. I have generated thousands of
26 news stories and was called to personally handle the situation of
27 Hubbard's death. I have been called by the Church of Scientology
28

1 to testify as an expert researcher. Through my direct work, I
2 produced official recognitions of Scientology from various federal
3 agencies with letters to me that were used by Scientology in the
4 media and court cases around the world.

5 FAIR GAME AND ATTACKS ON SUPPRESSIVE PERSONS IS
6 A CENTRAL PART OF THE SCIENTOLOGY BELIEF SYSTEM
7

8 7. As an expert on Scientology policies and practices, I
9 have been provided a copy of a declaration by Lynn R. Farny ("Mr.
10 Farny"), dated October 18, 1993, in which he discusses the ethics
11 and justice system of Hubbard and Scientology. I have been asked
12 to respond.

13 8. Mr. Farny attempts to refute the idea that "Fair Game"
14 is a policy of Hubbard's and of Scientology. To do this, Mr. Farny
15 (1) cites an IRS tax exemption; (2) shows that Hubbard wrote about
16 honesty; (3) insists that Scientologists are, as a group, honest;
17 (4) argues that Scientology justice only seeks the truth and does
18 not punish; (5) insists that "Fair Game" meant only that one was
19 not protected by Scientology justice; and (6) claims how the
20 Guardian's Office was operating "totally contrary to Church
21 policy" and thus was disbanded.

22 9. First, Mr. Farny says the IRS has concluded that all
23 Scientology churches and missions "have not and do not engage in
24 criminal or other improper conduct." This statement is
25 demonstrably untrue. Scientology officials have been indicted and
26 found guilty and jailed in the United States, Canada and
27 elsewhere, starting with Hubbard's wife, Mary Sue. Many ranking
28 officials were named as unindicted co-conspirators, including

1 Hubbard and in-house Scientology legal counsel Kendrick "Rick"
2 Moxon.

3 10. What Mr. Farny is doing is what Hubbard incorporated
4 into Scientology: never admit to a flaw. While the records are
5 replete with evidence of criminal behavior by Scientology
6 officials acting in their capacity as Scientology officials, the
7 Hubbard attitude is never to admit to any flaw. The stance always
8 taken was, push the flaw away so that it had nothing to do with
9 Scientology. However, as I will show, it not only had everything
10 to do with Scientology, it had to do directly with Hubbard. That
11 was, in fact, why he was named as an unindicted co-conspirator.

12 11. Second, Mr. Farny quotes extensively from Hubbard to
13 show how Hubbard wrote about the need for honesty. But Mr. Farny
14 did not tell all. What Mr. Farny is selecting from is Hubbard's
15 most public writings. There was another - hidden - side of Hubbard
16 that shows he was literally two-sided, a schizophrenic whose
17 schizophrenia permeates all Scientology organizations as one judge
18 noted. (To be cited later.) This other side of Hubbard is what
19 produced the siege mentality and Fair Game, as set forth below.

20 12. Third, Mr. Farny's insistence that Scientologists are,
21 as a group, highly ethical is really not the issue. The worth of
22 Scientologists as a whole is not the issue. It can be conceded
23 they are good people without detracting from the pernicious nature
24 of Hubbard's "Fair Game" policy or his attitudes towards his
25 enemies, which he called enemies of Scientology.

26 13. Fourth, Mr. Farny argues that the Hubbard/Scientology
27 system of ethics and justice is "based solely on getting to the
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1 truth" and has nothing to do with punishment.

2 14. Mr. Farny noticeably fails to say what the purpose of
3 Scientology ethics is. According to Hubbard, "The purpose of
4 Ethics is TO REMOVE COUNTER-INTENTIONS FROM THE ENVIRONMENT."
5 (HCOPL 18.6.68 Ethics; caps in original) Since intentions do not
6 exist apart from people, the question becomes, intentions counter
7 to whom? The answer is, Hubbard's. Anyone and anything which is
8 counter to Hubbard's intention is the target of ethics. This is
9 crucial to understand Hubbard's ethics, the role of the Guardian's
10 Office aka Office of Special Affairs and "Fair Game."

11 15. Disagreement and the interchange of ideas is central to
12 American society. But it is forbidden in Scientology because
13 Scientology is a closed system. It does not allow the intrusion of
14 new (non-Hubbardian) ideas. It is also self-defining. Happiness is
15 according to Hubbard's definition. Survival is according to
16 Hubbard. Sanity is according to Hubbard. If one disagrees with
17 Hubbard's views, the fault is in the person, not Hubbard. It is up
18 to the person to sort out his or her problem until agreement with
19 Hubbard is achieved. (There are a variety of tools to produce
20 this.) If the person continues to challenge a Hubbard idea, then
21 ethics (up to the sanction of Fair Game) is used.

22 16. Mr. Farny says there is no punishment in the Scientology
23 belief system. For the general public, this is true. But it is not
24 true for staff and there are many recorded instances of which I am
25 personally aware: people being locked in a room and screamed at by
26 several people until they break or confess; people being locked up
27 in chain lockers on Hubbard's boat on his orders; people being
28

1 thrown overboard with hands and feet tied; people put on diets of
2 rice and beans; people kept up for days without sleep; people
3 being made to sleep on floors, in closets or in "pig's berthing"
4 (the name says it); people spending years at hard labor at the
5 notorious (and secret) gulags known as the Rehabilitation Project
6 Force (RPF); people being physically assaulted and beaten for
7 refusing to comply; people being made to run until they dropped in
8 the desert sun and then being made to run some more, etc.

9 17. Such abuses are well known by staff members,
10 particularly in the Sea Organization. But it is a crime against
11 Scientology, subject to appropriate punishments, to make them
12 known to the non-Scientology world, which might then intrude. I
13 have personally known Mr. Farny for perhaps 10 years. I know that
14 he knows of some of these abuses. I also know that he is a devout
15 Scientologist who has been at one of these gulags and who was
16 released after executives felt he had been "rehabilitated". The
17 truth is that there is punishment in Scientology. Hubbard's
18 original "Manual of Justice" even made that point as early as 1959
19 (ATTACHMENT P):

20 "The whole subject of justice subdivides for a
21 Scientologist into four phrases. These are:

22 "1. Intelligence Activities;

23 "2. Investigation of Evidence;

24 "3. Judgment or Punishment; and

25 "4. Rehabilitation (Manual of Justice, at p. 4. Added
26 emphasis.)

27 And later:

1 "None of us like to judge or to punish. Yet we may be
2 the only people on Earth with a right to punish - since
3 we can undo the damage we do in most cases." (Id., at p.
4 7. Added emphasis.)

5 18. In the same manual, Hubbard also instructed how
6 "investigation" can be used to "crush" people. This "manual" is,
7 in fact, where one can find the philosophical origins of the
8 practices which came to be known as "Fair Game." (There is an
9 earlier reference that I will take up later. See ¶ __.)

10 "Remember that - by investigation alone we can curb
11 pushes and crush wildcat people and unethical "Dianetics
12 and Scientology" organizations." (Manual of Justice, at
13 p. 3.)

14 19. A few years later, Hubbard introduced the doctrine of
15 using "manufactured" evidence as a threat. On August 15, 1960, the
16 "Department of Government Affairs" was established with a policy
17 written by Hubbard. (ATTACHMENT R) This was the forerunner of the
18 Guardian's Office, later called the Office of Special Affairs. In
19 that issue, Hubbard ordered:

20 "If attacked on some vulnerable point by anyone or
21 anything or any organization, always find or manufacture
22 enough threat against them to cause them to sue for
23 peace. Peace is bought with an exchange of advantage,
24 so make the advantage and then settle. Don't ever
25 defend. Always attack. Don't ever do nothing.
26 Unexpected attacks in the rear of the enemy's front
27 ranks work best. (emphasis added.)

1 "The goal of the Department is to bring the government
2 and hostile philosophies or societies into a state of
3 complete compliance with the goals of Scientology. This
4 is done by high level ability to control and in its
5 absence by low level ability to overwhelm. Introvert
6 such agencies. Control such agencies. Scientology is the
7 only game on Earth where everybody wins. There is no
8 overt in bringing good order."

9 20. An "overt" in Scientology is a transgression, a wrong.
10 What Hubbard is saying lays the moral groundwork for Fair Game. He
11 said, as long as one is producing compliance with Hubbard's
12 objectives, there is no moral wrong being committed. In other
13 words, as to the world of non-scientologists, the end justifies
14 the means. This is how Fair Game was started and it is the
15 current view of the dedicated GO/OSA staff member.

16 21. Mr. Farny makes a point of "harmful acts" but he fails
17 to define them in Hubbard's terms and according to the policy that
18 is binding on Scientologists. It is defined in a bulletin Hubbard
19 wrote on October 23, 1983, called "Sec Checking: Note."

20 (ATTACHMENT S) In it Hubbard said the true "harmful act" that Mr.
21 Farny is citing is "something contrary to the mores of a group..."
22 Hubbard is very emphatic on this. Scientology "technically is NOT
23 interested in confidences or overts [harmful acts] against a
24 group's enemies or withholds [secrets] thereof." In other words,
25 as of 1983, actions committed against "enemies" are not of moral
26 or ethical interest. Only those committed against Scientology.
27 This is the ethical view that allows Fair Game to stay in place.

1 22. It should never be thought that Scientology attacks its
2 critics for anything other than personal reasons. Much is made of
3 the crusades against abuses, but in 1967 Hubbard made it clear why
4 any attack is made by Scientology and when it will stop. The
5 following is from HCO Bulletin 5 Nov 67 "Critics of Scientology"
6 (ATTACHMENT T):

7 "We are slowly and carefully teaching the unholy a
8 lesson. It is as follows: "We are not a law enforcement
9 agency. BUT we will become interested in the crimes of
10 people who seek to stop us. If you oppose Scientology we
11 promptly look up - and will find and expose - your
12 crimes. If you leave us alone we will leave you alone."

13 23. Fifth, regarding Fair Game, Mr. Farny once again
14 has been less than candid. He has said Fair Game "meant simply
15 that an individual so labelled was not entitled to the protection
16 of the Scientology system of justice." He says later it is "a
17 direct reference to what individuals who cannot have access to the
18 Scientology justice system are likely to receive at the hands of
19 the justice systems extant in society." Since the issue of Fair
20 Game has been challenged and contested and argued for years, I
21 would like to set the record straight. The following information
22 is based upon my studying highly confidential Guardian Office
23 files and reports and other writings and issues from Hubbard.

24 24. Fair Game became a subject of controversy in 1968 during
25 governmental inquiries in the United Kingdom. By then, Hubbard
26 had already suffered a severe setback in Australia. In 1965, the
27 Australian Board of Inquiry into Scientology had published its
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1 final report after sitting for 160 days and hearing 151 witnesses.
2 The opening words of the report foretold what was to come:

3 "There are some features of Scientology which are so
4 ludicrous that there may be a tendency to regard
5 Scientology as silly and its practitioners as harmless
6 cranks. To do so would be gravely to misunderstand the
7 tenor of the Board's conclusions. This Report should be
8 read, it is submitted, with these prefatory observations
9 constantly in mind. Scientology is evil; its technique
10 evil; its practice a serious threat to the community,
11 medically, morally and socially; and its adherents sadly
12 deluded and often mentally ill."

13 The report also said Hubbard's sanity was "gravely doubted." In
14 December 1965, the Australian government began to act when the
15 state of Victoria passed the Psychological Practices Act which
16 basically banned the practice of Scientology in that state. A few
17 months later, on February 7, 1966, there was a call in the British
18 House of Commons for a comparable inquiry. This is what set the
19 stage for a flurry of retaliatory actions by Hubbard that are
20 embedded in Scientology policy to this day.

21 25. On March 7, 1965, Hubbard wrote Hubbard Communications
22 Office Policy Letter (HCOPL) of March 7, 1965, titled "Ethics:
23 Suppressive Acts: Suppression of Scientology and Scientologists:
24 The Fair Game Law" (ATTACHMENT A) It gave the official definition
25 of "Fair Game." Hubbard wrote,

26 "By FAIR GAME is meant, without rights for self,
27 possessions or position, and no Scientologist may be
28

1 brought before a Committee of Evidence or punished for
2 any action taken against a Suppressive Person or Group
3 during the period that person or group is 'fair game'."

4 (A revision of December 23, 1965, changed it to read,
5 "By FAIR GAME is meant, may not be further protected by
6 the codes and disciplines of Scientology or the rights
7 of a Scientologist.")

8 26. As to what was a "suppressive person," Hubbard gave the
9 definition:

10 "A SUPPRESSIVE PERSON or GROUP is one that actively
11 seeks to suppress or damage Scientology or a Scientology
12 by Suppressive Acts.

13 "SUPPRESSIVE ACTS are acts calculated to impede or
14 destroy Scientology or a Scientologist and which are
15 listed at length in this policy letter."

16 27. Some of the suppressive acts listed included "public
17 disavowal of Scientology;" "public statements against
18 Scientology;" asking for a refund of fees paid; and "writing
19 anti-Scientology letters to the press." Even turning a
20 Scientologist into the proper authorities can gain one the label
21 of a suppressive. The issue also prohibits "1st degree murder,
22 arson, disintegration of persons or belongings not guilty of
23 suppressive acts." (emphasis added)

24 28. It should be noted that the policy letter in which all
25 of the above appears is also the original which gives the
26 "simple, five step procedure" (known to Scientologists as "A to
27 E") that Mr. Farny quotes. Also this policy letter was published
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1 under the "Fair Game Law" title as late as 1980 in Volume 1 of
2 "The Organization Executive Course: An Encyclopedia of Scientology
3 Policy" by L. Ron Hubbard. The issue "Suppressive Acts:
4 Suppression of Scientology and Scientologists: The Fair Game Law"
5 appears on page 552 et seq, which shows that Fair Game continues.
6 These volumes have been reprinted again to launder out certain
7 phrases and issues of Hubbard that are giving executives legal
8 problems. This is being done without telling church members and
9 contrary to an issue called "The Integrity of Source" which
10 prohibits anyone other than Hubbard from making changes in his
11 writings. This will be addressed later.

12 29. Hubbard's own application of Fair Game tactics are what
13 were later used as the model. They showed up a few months after
14 this issue when he wrote HCO Executive Letter 27 September 1965 on
15 "Amprinistics." (ATTACHMENT B) This was what he called a
16 "splinter" group, a group that was using Scientology methods
17 without his control. Hubbard's three-page issue blasts the
18 Amprinistics founders with a variety of sexual charges. (Sexual
19 conduct, particularly homosexuality, and communism were two of
20 Hubbard's favorite topics for accusations.) Hubbard declared the
21 Amprinistics Fair Game. Since Hubbard is the source of Scientology
22 policy and definitions, here is a prime example of Hubbard view of
23 Fair Game:

24 "They are each fair game, can be sued or harassed [sic].
25 Horner can be barred out of any Commonwealth Country or
26 England as he was the subject of a deportation order
27 from England and his file has come alive again in the
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Home Secretary's Office. Harry Thompson's wives and victims are always looking for him to have him arrested. Watson is a set-up for arrest as a homosexual. Any meeting held by them should be torn up. The names of any persons attending should be collected and they should be labelled SP [suppressive person] as they have left Scientology. These people are SP because they are seeking to avoid auditing and retain their withholds. Once labelled, these persons will not then be covered by amnesty and will never be admitted to further training and processing. Persons messing themselves up with Amprinistic [techniques] should be refused any assistance. If these persons move into your area act through any agency you can to have them deported or arrested on whatever grounds. England is currently too hot for them so they may tour about. Horner's UK deportation order, Thompson's police record and Watson's homosexuality make them very vulnerable to deportation or arrest."

30. Hubbard does not stop there. He goes on to issue a five-step order that includes:

"(2) Harass these persons in any possible way. . . .

"(4) Tear up any meeting held and get the names of those attending and issue SP orders on them and you'll have lost a lot of rats."

31. Clearly Hubbard had another side, a side that only staff members (not the public) have seen. These are the Hubbard writings

1 that laid the basis of "fair game," and not what Mr. Farny has
2 tried to represent through glowing Hubbard platitudes that were
3 written for public consumption, the media, the courts and the IRS.
4

5 32. In 1966, Hubbard began to codify those sections of
6 Scientology that would implement Fair Game. For example, on
7 February 17, 1966, he created the Public Investigation Section
8 with a policy letter of that name and date. (ATTACHMENT C) As
9 Hubbard put it,

10 "It will be seen that the section has all the useful
11 functions of an intelligence and propaganda agency. It
12 finds the data and sees that it gets action."

13 In that vein, "Standard intelligence procedures are used," he
14 wrote. The statistic of the unit included "the number of
15 derogatory news stories appearing that week related to enemies of
16 Scientology." He said,

17 "The section should note that press and the public are
18 interested in murder, assault, destruction, violence,
19 sex and dishonesty, in that order. Investigations which
20 can uncover these factors in the activities of
21 individuals of a group attacking Scientology are
22 valuable in the degree that they contain a number of
23 these factors."

24 Hubbard was also not beyond advocating the stirring of racial
25 hatreds:

26 "Associating the attacking group's activities with
27 reprehensible groups in the past by using familiar
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descriptive words will be found very effective. For example, if the word 'white' has been made hateful to the public by some past criminal group we use 'white' in our descriptive terminology concerning the group that is attacking us and whom we are investigating."

He later concludes, "In that way we then get rid of suppressive groups by investigation and disclosure."

33. The next day, on February 18, 1966, Hubbard wrote "Attacks on Scientology" (ATTACHMENT D) in which he again urged the use of investigations. Suppressives, he said, have crimes. "These people who attack have secrets. And hidden crimes. They are afraid." He thus urged they be investigated as this, he said, would cause the attacker to withdraw.

34. A week later, on February 25, 1966, he wrote another "Attacks on Scientology" policy letter (ATTACHMENT E) in which he urged, to "Start feeding lurid, blood sex crime actual evidence on the attackers to the press."

35. On March 1, 1966, Hubbard formed the Guardian's Office which took over the intelligence function just described.
(ATTACHMENT F)

36. As problems escalated for Hubbard, he wrote an issue on October 18, 1967 "Penalties for Lower Conditions" (ATTACHMENT G) whereby Fair Game was automatically issued on anyone (including staff members) who was an "enemy." They were, he said, "SP Order. [An order declaring them suppressive.] Fair game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied

1 to or destroyed." (emphasis added)

2
3 37. As international problems continued for Hubbard, one of
4 the objects of investigation was Fair Game. Issues such as the one
5 on Amprinistics were becoming public relations problems and so on
6 October 21, 1968, Hubbard wrote an issue ("Cancellation of Fair
7 Game" ATTACHMENT H) that said it was a public relations problem.
8 There was no mention of morality. The entirety of the policy
9 letter (P/L) is as follows:

10 "The practice of declaring people FAIR GAME will cease.
11 FAIR GAME may not appear on any Ethics Order. It causes
12 bad public relations.

13 "The P/L does not cancel any policy on the treatment or
14 handling of an SP. [suppressive person]

15 L. Ron Hubbard

16 Founder"

17 38. Since 1968, Scientology officials (including myself when
18 I was asked the question) insisted that the practice of "Fair
19 Game" was canceled with this issue. The Court must notice Hubbard
20 is talking about banning the use of the words "Fair Game" from
21 Scientology documents authorizing Scientologists to trick, sue,
22 lie or destroy suppressive persons. And the reason is public
23 relations. But the treatment of people does not change. Hubbard
24 expressly states this "Policy Letter does not cancel any policy on
25 the handling of an SP" As shown above, Suppressive Persons were
26 to be attacked, tricked, sued, lied to or destroyed. This policy
27 did not change. In other words, Hubbard did not cancel his order
28 that suppressives could be "tricked, sued or lied to or

1 destroyed." That was a policy for the treatment of suppressives
2 and this so-called "cancellation of Fair Game" clearly states that
3 those treatments (or "handlings") were to continue unabated.

4 39. If the practice of Fair Game had been canceled, then the
5 treatment or handling of "suppressives" would have changed.
6 However, they did not and this is proven by Hubbard and the courts
7 as well as voluminous documents and witnesses, and Mr. Farny knows
8 this. That will be taken up shortly.

9 40. On February 16, 1969, Hubbard wrote "Confidential:
10 Targets, Defense" (ATTACHMENT I) in which he listed "vital targets
11 on which we must invest most of our time..." The first and most
12 important: "T1. Depopularizing the enemy to a point of total
13 obliteration."

14 41. Also on February 16, 1969, he wrote "Confidential:
15 Battle Tactics" (ATTACHMENT J) where he urged the use of military
16 tactics and strategy in dealing with the "enemy." He wrote:

17 "A good general expends the maximum of enemy troops and
18 the minimum of his own. He makes the war costly to the
19 enemy, not to himself. One cuts off enemy
20 communications, funds, connections. He deprives the
21 enemy of political advantages, connections and power. He
22 takes over enemy territory. He raids and harasses. All
23 on a thought plane - press, public opinion, governments,
24 etc." (emphasis added)

25 He also urged the use of intelligence to get the "who when where
26 what." (sic)

27 42. Hubbard wrote considerable material on the use of
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1 intelligence and covert operations. For example, in "Confidential:
2 Intelligence-Actions: Covert Intelligence: Data Collection" of
3 December 2, 1969, (ATTACHMENT K) Hubbard said how these are
4 carried out with a "Case Officer" and agents.

5 "Essentially a covert operation is intended to
6 embarrass, discredit or overthrow or remove an actual or
7 possible opponent. It is a small war carried on without
8 its true source being disclosed."

9 43. By 1971, Hubbard was directing an international spy
10 network and he felt it was paying off. On May 7, 1971, he wrote GO
11 [Guardian Order] 070571 LRH "Secret: Notes on Smersh". (He took
12 the word from the James Bond novels to refer to an international
13 conspiracy that he believed was directing the attack on him.) He
14 said,

15 "Penetration is always a win. We have made it in finding
16 WHO attacks Scientology from where by doing what. This
17 gives us an ever further penetration. We have found as
18 well the ex intelligence officer mouth pieces [sic] in
19 the UK that influence that government and push Nazi
20 aims. We are getting even further penetration now into
21 who is keeping this planet upset."

22 44. In 1972, he issued an order titled "CONFIDENTIAL:
23 Black Propaganda" (GO 011272 LRH) (ATTACHMENT M) Also known as
24 "Black PR," short for "black propaganda." Hubbard defined the
25 topic:

26 "Black Propaganda is a covert communication of false
27 info[rmation] intended to injure, impede, or destroy the
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1 activity or life of another person, group or nation,
2 usually issued from a false or removed source from the
3 actual instigator.

4 "It is used heavily in 'psychological warfare'."

5 In a warped sense of logic, Hubbard said,

6 "Our propaganda is dirty but it is not black because it
7 is true. Black propaganda is essentially false.

8 "We can do this trick (as in the new operating plans I
9 wrote) by survey and attack."

10 45. The "operating plans" Hubbard was referring to comprised
11 the Top Secret "Snow White" program of which I was part. The Snow
12 White Program had basically three arms: public relations, legal
13 and intelligence. It was the intelligence arm that was raided by
14 the FBI in 1977. A good portion of the Snow White Program was
15 based on the Fair Game doctrines described above, since the
16 program was aimed at Hubbard's "enemies" and "suppressives."

17 46. On October 6, 1979, Hubbard's wife Mary Sue and eight
18 other Scientology executives signed a 282-page (plus exhibits)
19 Stipulation of Evidence that detailed the government's case. That
20 document details the burglaries, forgeries, conspiracies to
21 obstruct justice and other crimes committed. But it is the
22 Sentencing Memorandum for Jane Kember (The Guardian) and Mo
23 Budlong (her intelligence chief) of September 16, 1980, by
24 Assistant US Attorney Raymond Banoun that gives the most succinct
25 view of how Fair Game was conducted after 1968. In fact, the memo
26 discloses an admission by defendants that Fair Game continued even
27 beyond the conviction of Mary Sue Hubbard, until mid-1980. (Banoun
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1 questions in the memo "as to whether these illegal activities were
2 ever terminated by these defendants.")

3 47. The memo relates how the defendants combined
4 intelligence and legal to defraud and abuse the courts. Portions
5 are hereby excerpted from it.

6 "These crimes included: the infiltration and theft of
7 documents from a number of prominent private, national
8 and world organizations, law firms, newspapers and
9 private citizens; the execution of smear campaigns and
10 baseless law suits for the sole purpose of destroying
11 private individuals who had attempted to exercise their
12 First Amendment rights to freedom of expression; the
13 framing of private citizens who had been critical of
14 Scientology, including the forging of documents which
15 led to the indictment of at least one innocent person;
16 and violation of the civil rights of prominent private
17 citizens and public officials." (page 3)

18 48. The memo points out how Mary Sue Hubbard had said on the
19 witness stand that she and her codefendants "felt they could do to
20 others whatever they perceived, however erroneously, others were
21 doing to them." (page 6)

22 "They presented this Court with a shabby attempt at
23 impeaching Meisner's credibility [the Scientology
24 intelligence agent who turned and started the
25 investigation that led to the raid] by claiming that he
26 stole money from the Church - the same false claim they
27 made against another former Scientologist who had the
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courage to expose their crimes and thus fell victim to
their fair game doctrine. Allard vs. Church of
Scientology of California, 68 Cal. App. 3d 439, 129 Cal.
Rptr. 797 (Ct. App 1976), cert. denied, 97 S. Ct. 1101
(1977)." (page 14)

"The defendants' contention that they committed the
crimes of which they stand convicted in order to protect
their Church from Government harassment collapses when
one reviews a sample of the remaining documents seized
by the FBI during the execution of the two Los Angeles
search warrants. If anything, these documents establish
beyond question that the defendants, their convicted
co-defendants, and their unindicted co-conspirators
[which included Ron Hubbard and current Scientology
counsel Kendrick Moxon], as well as their organization,
considered themselves above the law. They believed that
they had carte blanche to violate the rights of others,
frame critics in order to destroy them, burglarize
private and public offices and steal documents outlining
the strategy of individuals and organizations that the
Church had sued. These suits were filed by the Church
for the sole purpose of financially bankrupting its
critics and in order to create an atmosphere of fear so
that critics would shy away from exercising the First
Amendment rights secured them by the Constitution.¹ The

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¹ This is precisely how Scientology's critics viewed
Scientology's activities. Newsweek, November 20, 1978 at 133:
"The Church of Scientology relies on suits and petty

1 defendants and their cohorts launched vicious smear
2 campaigns, spreading falsehoods against those they
3 perceived to be enemies of Scientology in order to
4 discredit them and, in some instances, to cause them to
5 lose their employment. Their targets included, among
6 others, the American Medical Association (AMA), which
7 had branded Scientology's practice of "dianetics" as
8 "quackery"; the Better Business Bureau (BBB), which
9 sought to respond to private citizen's inquiries about
10 the courses offered by Scientology; newspapers which
11 merely sought to report the news and inform the public,
12 law firms which represented individuals and
13 organizations against whom Scientology initiated law
14 suits (often for the sole purpose of harassment);
15 private citizens who attempted to exercise their First
16 Amendment rights to criticize an organization whose
17 tactics they condemned; and public officials who sought
18 to carry out the duties for which they were elected or
19 appointed in a fair and even-handed manner. To these
20 defendants and their associates, however, anyone who did
21 not agree with them was considered to be an enemy

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23 harassment to register its complaints. In August, the
24 Scientologists slapped a \$1 million suit on the Los
25 Angeles Times after it ran a series about the Church.
26 The Times wasn't accused of libel; rather, the
27 Scientologists claimed that the paper conspired with the
28 FBI and Justice Department to violate the church's civil
rights by poisoning the atmosphere before a trial" of
the nine convicted co-defendants. (See also discussion,
infra, regarding Scientology's lawsuits against its
perceived "enemy", Paulette Cooper.)

1 against whom the so-called "fair game doctrine" could be
2 invoked. Allard v. Church of Scientology of California,
3 supra. That doctrine provides that anyone perceived to
4 be an enemy of Scientology or a "suppressive person,"
5 "[m]ay be deprived of property or injured by any means
6 by any Scientologist without any discipline of the
7 Scientologist. [He m]ay be tricked, sued or lied to or
8 destroyed." (Id., 58 Cal. App. 3d at 413 n.1, 129 Cal.
9 Rptr. at 800 n.1.)² This policy, together with the
10 actions of these defendants who represent the very top
11 leadership of the Church of Scientology, bring into
12 question their claim that their Church prohibited the
13 commission of illegal acts." (pp 10-11)

14 "It is interesting to note that the Founder of their
15 organization, unindicted co-conspirator L. Ron Hubbard,
16 wrote in his dictionary entitled 'Modern Management
17 Technology Defined' that "truth is what is true for
18 you," and 'illegal' is that which is 'contrary to
19 statistics or policy' and not pursuant to Scientology's
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21
22 ² This led the California Court of Appeals to state that
23 "Any party whose tenets include lying and cheating in order to
24 attack its 'enemies' deserves the results of the rick which such
25 conduct entails." (Id., 58 Cal. App. 3d at 452, 129 Cal. Rptr. at
26 805.)

27 "Defendants, through one of their attorneys, have stated
28 that the fair game policy continued in effect well after
the indictment in this case and the conviction of the
first nine co-defendants. Defendants claim that the
policy was abrogated by the Church's Board of Directors
in late July or early August, 1980, only after the
defendants personal attack on [Federal] Judge Richey."
(Transcript of September 5, 1980, at 14.)

1 'approved program.' Thus with the Founder-Commodore's
2 blessing they could wantonly commit crimes as long as it
3 was in the interest of Scientology."

4 "These defendants rewarded criminal activities that
5 ended in success and sternly rebuked those that failed.
6 The standards of human conduct embodied in such
7 practices represent no less than the absolute perversion
8 of any known ethical value system. In view of this, it
9 defies the imagination that these defen-dants have the
10 unmitigated audacity to seek to defend their actions in
11 the name of 'religion.'" (page 33)

12 "It is clear from the press releases issued by
13 Scientology following the jury's verdict, and their
14 vicious actions against another member of this Court,
15 that they have yet to learn the errors of their criminal
16 ways." (page 34)

17 49. The other member of the Court that was being referred to
18 was Federal District Judge Charles Richey who was the target of a
19 sting operation conducted by a private investigator hired by
20 Scientology that forced the judge to recuse himself from the
21 Scientology case on which he was sitting. The judge was allegedly
22 set up with a prostitute. The action was Fair Game. Scientology
23 publications however called it a "BIG WIN." He would not be the
24 last judge to be the target of Scientology Fair Game.

25 50. Mr. Farny is asking the Court to believe that because
26 there are writings prohibiting actions such as Fair Game, it is
27 not being conducted. However, that argument was made on December
28

1 27, 1979, when "The Controller Committee" issued Guardian Order
2 3031 called "Scientology And The Law" under Hubbard's name
3 (ATTACHMENT U) in which they stressed compliance with the law. (It
4 should also be noted this urging of compliance with the law was
5 released only after Mary Sue Hubbard and the others signed the
6 Stipulation of Evidence.) The issue contains many of the same
7 platitudes that Mr. Farny quotes in his declaration. Regardless of
8 the platitudes issued in 1979, about a year later, the hypocrisy
9 came out when the Government revealed that the defendants
10 confessed that Fair Game had continued up through mid-1980 and may
11 have continued past that point.

12 51. In fact, Fair Game did continue. Although the Guardian's
13 Office was "disbanded," a new campaign was undertaken against
14 Gerald Armstrong in 1981, a staff member who had fled with some of
15 Hubbard's files. Contrary to what Mr. Farny said, there were Fair
16 Game actions taken against Armstrong after the GO was "disbanded."
17 I know because I sat in on those strategy meetings and was ordered
18 by Hubbard as well as David Miscavige to "get Armstrong." For
19 example, Hubbard ordered a "reward" poster that would characterize
20 Armstrong as a criminal. (I did not comply with the order, for
21 which I was severely berated by Miscavige.)

22 52. The use of Fair Game on Armstrong was confirmed in 1984
23 when California Superior Court Judge Paul Breckenridge, Jr., ruled
24 against Scientology with an opinion that included a statement
25 about the civil rights of members and Hubbard:

26 "In addition to violating and abusing its own members
27 civil rights, the organization over the years with its
28

1 'Fair Game' doctrine has harassed and abused those
2 persons not in the Church whom it perceives as enemies.
3 The organization clearly is schizophrenic and paranoid,
4 and this bizarre combination seems to be a reflection of
5 its founder LRH. The evidence portrays a man who has
6 been virtually a pathological liar when it comes to his
7 history, background, and achievements. The writings and
8 documents in evidence additionally reflect his egoism,
9 greed, avarice, lust for power, and vindictiveness and
10 aggressiveness against persons perceived by him to be
11 disloyal or hostile." (ATTACHMENT N)

12 53. Another judge who stepped down from a Scientology case
13 was Federal District Judge James M. Ideman. But as he did so, he
14 filed a declaration in his court on June 21, 1993, (ATTACHMENT O)
15 which said, in part:

16 "Plaintiff has recently begun to harass my former law
17 clerk who assisted me on this case, even though she now
18 lives in another city and has other legal employment.
19 This action, in combination with other misconduct by
20 counsel over the years has caused me to reassess my
21 state of mind with respect to the propriety of my
22 continuing to preside over the matter."

23 54. Part of the problem, he said, was seeking to have
24 Scientology comply with discovery. They would not comply:

25 "This noncompliance has consisted of evasions,
26 misrepresentations, broken promises and lies, but
27 ultimately with refusal."
28

1 55. Judge Ideman later remarks how Scientology apparently
2 views "litigation as war" and seeks to break the opposition
3 through increased litigation costs. This is not news to members of
4 the Guardian's Office, now known as the Office of Special Affairs.
5 This tactic was laid out by Hubbard as early as 1955 in The
6 **Scientologist: A Manual on The Dissemination of Material**
7 (ATTACHMENT Q). In it Hubbard said:

8 "The law can be used very easily to harass and enough
9 harassment on somebody who is simply on the thin edge
10 anyway, well knowing that he is not authorized, will
11 generally be sufficient to cause his professional
12 decease. If possible, of course, ruin him utterly."

13 (Added emphasis.)

14 Hubbard wrote this in 1955 but, like Fair Game, it is still
15 followed.

16 56. It must be remembered that Fair Game is not the result
17 of one policy letter from Hubbard. It was and is embedded in the
18 organization through scores of Hubbard policies and directives. It
19 was exposed after the raid of 1977 and again in the court of Judge
20 Breckenridge in 1984 and in the courtroom of Judge Ideman in 1993.
21 Time and again Scientology officials have insisted that it has
22 ended. Now Mr. Farny is seeking to hoodwink this Court by
23 returning to the original argument, disregarding history and
24 facts. Ironically, that too is part of Fair Game.

25 57. Lastly, on the matter of Jane Kember: The Guardian was
26 the most powerful position in Scientology after Hubbard himself
27 and his wife Mary Sue. The Guardian was able to move any bank
28

1 accounts, close and open organizations, expel people, etc. As late
2 as 1970, Hubbard wrote, "The two most effective arms of Dianetics
3 and Scientology are the Sea Org[anization] and the Guardian's
4 Office." (ATTACHMENT V) Mr. Farny's statement that "Kember's
5 removal and the disbanding of the GO were the results of the
6 discovery by CSI's management that a few members of the GO. . .
7 had undertaken actions totally contrary to Church policy" is as
8 ridiculous as it is false. It was the FBI and Department of
9 Justice that discovered and exposed the crimes, not CSI
10 management. And Kember was fanatically defended until she was
11 found guilty and went to jail. Mr. Farny knows this. Nor was the
12 GO disbanded. It was taken over. It was renamed, in the same
13 offices, had the same personnel and operated from the same
14 policies from Hubbard. The person who oversaw the "disbanding" was
15 David Miscavige, who directed the Fair Game actions on Armstrong
16 from what was called "Special Project" which was, in fact, Author
17 Services, Inc., where I was employed.

18 58. The policies and directives cited in this declaration
19 are from Hubbard. I chose to cite his words rather than the even
20 more voluminous Fair Game materials authored by others because
21 Hubbard's writings are considered "scripture" by Scientology and
22 they cannot be canceled or changed except by him. Since he died in
23 1986, nothing past that point can be changed. This was stated in
24 an issued of July 7, 1982, called "The Integrity of Source"
25 (ATTACHMENT W) which said:

26 "It is hereafter firm Church policy that LRH ISSUES ARE
27 TO BE LEFT INTACT AS ISSUED.
28

1 "No one except LRH may cancel his issues.

2 "No one except LRH can revise his issues whereby changes
3 are incorporated into the text and then reissued. Any
4 valid revisions must hereafter be made in a separate
5 issue stating the change and how the revision is to be
6 read. . . .

7 Already existing issues stand intact and valid."

8 DETAILED DISCUSSION OF MY INVOLVEMENT WITH SCIENTOLOGY

9 A. Initial Involvement In Davis, California.

10 59. This long association began in 1968 when I began
11 studying Scientology while working in the Ph.D. program at the
12 University of California, Davis. I even used Scientology books in
13 the philosophy courses that I was teaching. By late 1968 my
14 personal study of Scientology had progressed to the point that I
15 began to book audit. I acquired hundreds of hours of experience
16 as a book auditor.

17 60. By 1969, I left the Ph.D. program to help start the
18 Dianetics and Scientology Mission of Davis. My functions included
19 giving the introductory lecture, supervising the communications
20 course, giving professional Dianetic auditing and handling public
21 relations for the Mission. This gave me considerable experience in
22 not only delivering basic services to new public but in how the
23 community viewed Scientology and how Scientology interacted with
24 the community. In my public relations capacity, I became quite
25 familiar with the area media and other groups. I organized and
26 presented a community anti-drug program on the UC Davis campus
27 that brought speakers from around the state in an all-day
28

1 symposium that received considerable media coverage.

2 61. While at the Davis Mission, I was asked by an inmate at
3 Vacaville Medical Prison to give a talk there. I did. Then I
4 started a Scientology group that I supervised with weekly meetings
5 for over two years. An article in the Sacramento Union recognized
6 me for my work.

7 B. Training In The Guardian's Office.

8 62. In early 1971, I joined the Guardian's Office (GO) of
9 the Church of Scientology, San Francisco. Today the Guardian's
10 Office is titled the Office of Special Affairs ("OSA"). The
11 Guardian's Office was the most powerful arm in Scientology.

12 63. Hubbard often said that the two most effective arms of
13 Scientology were the Guardian's Office and the Sea Organization. I
14 later became a member of the Sea Organization and became well
15 acquainted with its policies too. The basic difference was that
16 the Sea Organization (SO) is an internally focused group. Its
17 interest was in the day-by-day operation of the organizations in
18 order to make money. The Guardian's Office (GO) was an externally
19 focused group. It dealt primarily with perceived threats from the
20 media, lawsuits, government agencies and dissidents who had left
21 Scientology. However, the GO had powers not given to the SO. As
22 laid out in the Hubbard policy letter of 1 March 1966 that created
23 the office of The Guardian, The Guardian was the most powerful
24 position in Scientology, second only to Hubbard and his wife, Mary
25 Sue. The Guardian was able to expel people, move bank accounts,
26 close Scientology orgizations if they displeased Hubbard, etc.
27 This power extended down through a network of Deputy Guardians and
28

1 Assistant Guardians and their respective bureaus: Public
2 Relations, Finance, Intelligence and Legal. More bureaus were
3 added later.

4 64. When I joined the Guardian's Office, I was sent
5 immediately to Los Angeles for training in Public Relations
6 ("PR"). My training lasted from 9 a.m. until 11 p.m., six days a
7 week for over three months. It included studying the various
8 investigations into Scientology including the (then) on-going
9 challenge from the Food and Drug Administration and the
10 investigations into Scientology in Australia and New Zealand. I
11 also studied all press files which meant articles from around the
12 world, including the United Kingdom where there had been
13 considerable problems. I was provided and read confidential
14 reports from Scientology Public Relations Offices around the
15 United States to develop an understanding of how Scientologists
16 handled PR situations. I also read similar confidential reports
17 from international Public Relations Offices detailing how they
18 handled public relations situations. I thus became fully familiar
19 with the confidential PR history of Scientology up to that point,
20 meaning the history of the Church that was not being shared with
21 rank and file Scientologists. I was privy to the actual
22 behind-the-scenes story of what was happening and what was being
23 done to handle public relations problems.

24 65. My training also included studying material by Hubbard
25 and Guardian Office (GO) personnel on how to handle public
26 relations. This included tapes by Hubbard on the subject. Much of
27 this material was "confidential" which meant it was kept locked
28

1 away and was to be viewed only by authorized GO personnel. That
2 material advised on defining, identifying and dealing with those
3 viewed as "enemies" of Hubbard and Scientology.

4 66. My training also included "drills" which were exercises
5 to teach me what Hubbard considered to be basic PR skills. These
6 included how to write a press release and give a press conference
7 as well as how to respond to reporter's questions, how to divert a
8 reporter, how to stall for time, how to avoid questions, how to
9 introvert and cave in a person and other tactics.

10 67. My training also included shorter instruction (called a
11 "mini-hat") so I could temporarily manage the other bureaus,
12 including the Intelligence Bureau which ran covert operations.
13 During my tenure in Los Angeles I directly participated in one
14 large covert operation targeting an area mental health group. The
15 operation created considerable bad press for the group, severely
16 hurt their fund-raising and was not traced to Scientology. Thus I
17 was able to become intimately familiar with Hubbard's intelligence
18 techniques, methods and styles.

19 C. Service In The San Francisco, California Guardian's
20 Office.

21 68. When my training was completed, I returned to San
22 Francisco and assumed the position of Assistant Guardian (AG) so
23 the then-AG could go to Los Angeles for further "enhancement."
24 Since the AG is over all bureaus (PR, Finance, Intelligence,
25 Technical and Legal) I ran all bureaus. (The Technical Bureau was
26 subsequently moved to a non-GO area. Other bureaus were also
27 added, such as Social Coordination where major "front groups" that
28

1 generated income, such as Narconon, were run. The purpose of these
2 groups were to avoid appearing to be Scientology and thus avoid
3 detection and criticism, thus allowing us to gain a foothold into
4 an area.)

5 69. At that time the power of the GO was considerable. So
6 when several financial crises hit the San Francisco organization,
7 I implemented Hubbard's policy. I seized the accounts and ran the
8 finances of the entire organization until it was able to return to
9 solvency. (I also received several daily briefings from GO US in
10 Los Angeles to advise me.) This taught me the financial structure
11 of Scientology including how money was sent to various bank
12 accounts in San Francisco, Los Angeles and overseas.

13 70. As the AG, I also conducted internal investigations into
14 personnel in the organization according to Hubbard's policy in
15 order to determine staff qualifications. This was done by
16 reviewing their ethics files, personnel files and auditing
17 folders. I also investigated statistics throughout the
18 organization. I also learned how to alter records in the
19 organization to mask the trail of personnel going to the
20 Intelligence Bureau so they could not be traced back to
21 Scientology. (This was a standard practice for operatives. It
22 required destroying or altering records so there was no trace of
23 the persons should law enforcement try to find them.)

24 71. As the Public Relations Officer (PRO), I worked on
25 programs and orders from the Guardian's Office, US and the
26 Guardian's Office, World Wide (in England). In my functions, I
27 worked with all media in Northern California. I placed stories and
28

1 dealt with media to handle stories that Scientology considered to
2 be unfavorable. I went on several talk shows, including those with
3 major stations, as the Scientology spokesman for Northern
4 California.

5 72. I organized an Ecumenical Communications Council (ECC)
6 which consisted of representatives from about 50 area religions
7 or sects. The function of the ECC was to help all groups to
8 achieve better PR, especially with the media. Behind it was my own
9 desire to give me a stronger base for negotiating with the media.
10 The ECC was quite successful. In fact, for my work with the
11 community one San Francisco radio station named me "Citizen of the
12 Week," to my surprise.

13 73. While working in San Francisco, I had occasion to work
14 with other Dianetics & Scientology Missions, thus learning further
15 how the organization worked in a large area.

16 D. Promotion To The Guardian's Office United States,
17 Headquartered In Los Angeles, California.

18 1. Training.

19 74. In the latter part of 1973, I was promoted to the
20 Guardian's Office, United States (GOUS). GOUS was located in Los
21 Angeles, where I had received my training. The function of GOUS
22 was to direct and run all GO offices in the United States as well
23 as Mexico. (There were perhaps 15 at that time in major cities
24 around the U.S. plus one in Mexico.)

25 75. My first assignment at GOUS was to be the PR
26 Establishment Officer (PR Esto). My task was to work with all
27 personnel in the PR US Bureau, to ensure that they were better
28

1 trained etc. (There were about 10 people in the bureau when I
2 arrived.) This allowed me to learn all functions in the PR US
3 bureau and all personnel.

4 2. Snow White Program.

5 76. After a few months, however, I was assigned to the PR
6 section of the most secret and largest program in the Guardian's
7 Office - the Snow White Program. It consisted of several highly
8 secret programs written by Hubbard that were designed to ferret
9 out the source of international criticism of him and Scientology.
10 Persons were assigned to each bureau to carry out the Snow White
11 actions in that bureau. We had considerable authority and latitude
12 as well as finances and the Snow White program was the "highest
13 priority." It afforded me the opportunity to become familiar with
14 dozens of Scientology organizations across the United States.

15 77. One of the objectives of the PR Snow White program was
16 to get acceptances of Scientology from governmental agencies. I
17 personally did that in several instances. Sometimes after many
18 months of work including several trips to Washington, D.C.,
19 letters of recognition were written to me by several agencies
20 including the U.S. Air Force, Department of State and Department
21 of Labor. These letters were crucial to Scientology's legal
22 position internationally and were widely reproduced as well as
23 used in a variety of court cases.

24 3. Personal Role In Establishing "Front Groups".

25 78. During this time I helped to form "front groups" that
26 were nothing but letterhead, such as the National Commission on
27 Law Enforcement & Social Justice. We dreamed up the name one day
28

1 so we could sound "more official." There was no such "group"
2 other than our letterhead. But that was not unlike how Scientology
3 front groups operate. We simply created letterhead and pretended
4 that there was a real organization behind it. (If anyone ever
5 challenged it, would we have been able to go out and get a few
6 people who would claim they were active members to refute
7 criticism.) It was from this NCLE "group" that I conducted
8 research and found that Interpol (the International Criminal
9 Police Organization) had a Nazi history. (Scientology's other main
10 target in the US was the Federal Bureau of Investigations.) This
11 enabled Scientology to gain considerable media coverage for years
12 around the world. It also allowed me to testify twice be-fore
13 Congressional Subcommittees and to appear on scores of radio and
14 TV shows, including one hour on Tom Snyder's "Tomorrow" show.

15 E. Promotion To Guardian's Office Worldwide.

16 79. For my success, I was then sent to England where the
17 Guardian's Office World Wide (GOWW) was located. I was given
18 additional training in PR and learned how the other bureaus
19 operated. I was able to read confidential files and reports about
20 activities around the world. I was thus given an international
21 perspective in PR, Finance, Legal and Intelligence as well as the
22 operations of organizations.

23 80. I also traveled through Europe and met with staff in the
24 organizations in England, France, Netherlands, Denmark, Germany,
25 Austria and Belgium, giving me additional insight and information
26 into the operations of Scientology around the world.

27 F. Federal Bureau Of Investigation Raid.

1 81. In July of 1977, the Federal Bureau of Investigation
2 raided two Scientology locations in Los Angeles and one in
3 Washington, D.C., in what was then the largest raid in the FBI's
4 history. The target of their raid was the Intelligence Bureau of
5 GO US and GO DC. Within hours I was selected as the national
6 spokesman and briefed as to what to say. I held a press conference
7 at the Los Angeles Press Club on Vermont Avenue while the raid was
8 in progress. I was the spokesman for Scientology US in the days
9 that followed as the media continued to call.

10 82. The FBI took thousands of documents that the United
11 States Attorney's Office used to convict Hubbard's wife Mary Sue
12 and ten other GO personnel. Hubbard and a number of other
13 Scientology executives were named as unindicted co-conspirators.

14 83. Before the trial, I was allowed access to the documents
15 that the government was going to use. I read thousands of highly
16 confidential dispatches including communications among the highest
17 executives in Scientology. That was the first time I learned about
18 the extent of the illegal activity occurring in the Intelligence
19 Bureau. It also showed me my superiors had misled me by
20 misrepresenting to me the magnitude of the criminal conduct and
21 then using me as a national spokesperson who could convincingly
22 represent there was no wrongdoing, that the prosecution was all
23 "harassment" by the FBI and etc. because of my actual ignorance.
24 The extent of criminality was subsequently detailed and documented
25 in the 284-page Stipulation of Evidence that was used at the
26 sentencing of the executives. This publicly available document,
27 was kept away from rank and file Scientologists. It completely
28

1 refutes the position that was taken by me and by others,
2 especially in the years to follow.

3 84. While preparing for that trial, I was sent with a team
4 of people to Washington, D.C., in 1979, to try and create positive
5 press that would offset the bad press being generated. During that
6 time, my team worked with documents we legally gathered from
7 government files already obtained under the Freedom of Information
8 Act and generated several stories that went around the world.
9 These stories were about secret chemical-biological warfare
10 testing by the Central Intelligence Agency and the U.S. Army.
11 These stories were also written up in Freedom, under my byline,
12 "Vaughn Young."³ Freedom was published by the Guardian's Office.
13 I was also cited in other Scientology publications and issues as
14 an expert in my field.

15 85. In 1979, my book The Interpol Connection was published
16 by Dial Press, a non-Scientology publisher. The book is the
17 compilation of all my research. My co-author was a non-staff
18 member who was hired to help with the writing/composition of the
19 book while I continued my researches. I am identified in the book
20 as the Director of Research for the National Commission on Law
21 Enforcement & Social Justice, which, as stated earlier, was merely
22 a front organization.

23 G. Head Of Public Relations United States.

24 86. After the conviction of the Scientology executives, I
25

26
27 ³ This, like other material I published while I was in
28 Scientology appeared under the name Vaughn Young. I did not use my
legal first name "Robert" until after fleeing from Scientology in
1989.

1 returned to Los Angeles to head the Specialist Branch at PR US
2 which created booklets, Freedom and other publications. During
3 that time I authored additional stories for Scientology, some of
4 which went international such as the story about "BZ," a
5 hallucinogenic drug that the Army was testing. (This was also
6 written about in Freedom as well as in other Scientology
7 publications.) Also during my tenure in the GO, I worked to help
8 produce several books about Scientology that were published by
9 Scientology and outside authors, such as Omar Garrison.

10 H. Joining The Sea Organization.

11 87. Circa 1978, I joined the Sea Organization ("Sea Org" or
12 SO) and subsequently trained and earned rank in the Sea Org. SO
13 members live and eat communally. SO pay was \$24 a week. We lived
14 in a converted single-bed hospital room in the large Scientology
15 complex near Sunset and Vermont Streets in Los Angeles. Food was
16 available in a large dining area area on the first floor. We had
17 no private shower but used a communal shower down the hall. Thus I
18 am also intimately familiar with the Sea Org life style.

19 I. Diverting Media Attention Away From The Gilman Hot
20 Springs, California Ranch.

21 88. In 1980, I was told that a secret location where Hubbard
22 had stayed was being exposed in the media. The location was at
23 Gilman Hot Springs, near Hemet, California. My task was to go and
24 defuse the situation. The location was actually the secret
25 international headquarters of Scientology that also had a tape and
26 film production unit. I took command of the base, converted it to
27 look like it did nothing but film and tape production and
28

1 presented it to the media as Golden Era Studios, effectively
2 defusing the situation. It is an image that the base still carries
3 today, even though it is still the international headquarters of
4 Scientology.

5 J. Authorized Hubbard Biographer And Archivist.

6 89. In 1981, I was asked to go to a non-GO archives to
7 gather information about the writing of a biography on Hubbard.
8 The archives was operated by Gerry Armstrong and contained about
9 25 filing cabinets full of Hubbard's personal papers and
10 memorabilia. I worked there for several weeks and was the last
11 person to see Armstrong before he disappeared. I thereby inherited
12 the archives by default and continued to read Hubbard's private
13 papers, which gave me not only an entirely different view of the
14 man than what we had been telling Scientologists but a view that
15 no one else knew (at that time) besides Armstrong.

16 K. Transformation Of The Guardian's Office Into The Office
17 Of Special Affairs Is Nothing More Than A Name Change.

18 90. During this time, the GO was being converted to the
19 Office of Special Affairs. This was done under the direction of
20 Vicki Aznaran who later became Inspector General and has since
21 left Scientology. While it was later touted that the GO had been
22 "disbanded," the truth was that it was really nothing more than a
23 name change. The same people were running the group. We had the
24 same offices. We had the same policies. What did occur was the
25 power base moved from the GO to something called "Special Project"
26 which was being run by David Miscavige ("Miscavige").

27 91. The problem that OSA was facing was the inundation of
28

1 lawsuits naming Hubbard as a defendant. He had gone into hiding
2 and a unit had been set up to handle all the lawsuits. It was
3 called the "All Clear Unit." The name gave its objective: to
4 create an "all clear" for Hubbard so he could come out of hiding.

5 L. Hubbard's International Public Relations Network And
6 Reassignment To Author Services, Inc.

7 92. In early 1982, Miscavige asked me to head Hubbard's
8 international PR network. I agreed. I was taken to the
9 international headquarters at Golden Era Studios and introduced by
10 Miscavige to the then-Commanding Officer, Commodore's Messenger
11 Organization International (CO CMO INT), John Nelson.

12 93. After my return to LA, I was asked to join Special
13 Project instead. That was when I learned that Special Project was
14 really the newly formed Author Services, Inc. (ASI). ASI was a
15 for-profit group that was ostensibly created to be Hubbard's
16 literary agency. While ASI had that function, ASI's actual
17 functions were: (1) to run the "All-Clear Mission" by running the
18 GO/OSA which required constant meetings with ASI and GO/OSA staff
19 usually chaired by Miscavige; (2) to make money for Hubbard; (3)
20 to run the Church of Scientology to accomplish 1 and 2. This last
21 function was carried out in secret since we were a for-profit
22 corporation and the Church of Scientology was fighting the
23 Internal Revenue Service for its non-profit status. Thus, our
24 directing the "All Clear Unit" was also a well-kept secret.
25 My promotion to ASI was personally approved by Hubbard in a
26 dispatch titled "Vaughn" that defined the PR position that I was
27 assuming. My initial position was called Public Affairs Special
28

1 Project. It was worked out with Hubbard that "Public Affairs"
2 would be used so it could be easily differentiated from "Public
3 Relations" which would designate those in the non-profit area.
4 When we moved to offices at 6464 Sunset Boulevard in Hollywood, my
5 position became PA ASI (Public Affairs, Author Services, Inc.)
6 94. My primary function was to run Hubbard's public relations
7 network in the Church of Scientology that extended around the
8 world. This network was embedded mainly in what was called the
9 "LRH Comm Network" or L. Ron Hubbard Communicator Network. LRH
10 Comm's were supposed to be his personal representatives in each
11 organization. To execute my functions, I ensured that a person was
12 appointed to head the network internationally and met with her and
13 her juniors regularly, issuing orders on what to do. One of the
14 projects was to get "recognitions" for Hubbard, which were keys to
15 cities, commendations, etc. These were usually collected without
16 the issuer knowing who Hubbard was. Sometimes the "recognition"
17 would be withdrawn when they learned who he was.

18 95. Since ASI was the senior Scientology organization,
19 regular and numerous legal strategic meetings with Office of
20 Special Affairs personnel were held at ASI. Miscavige who was the
21 Chairman of the Board of ASI often chaired the meetings. The
22 object of these meetings was the many lawsuits that included
23 Hubbard as a defendant and and how to deal with the suits. I sat
24 in on many of those meetings and witnessed the orders being given
25 to church personnel on what to file, who to depose, what to object
26 to etc. Most of these orders came from Miscavige.

27 96. We also held meetings at ASI to direct other church
28

1 staff on what to do. These meetings were often for the purpose of
2 raising additional money or ordering the organizations to pay
3 large sums of money to ASI.

4 97. ASI also handled Hubbard's investments in gold, oil
5 wells, etc. To this end, additional corporations were created out
6 of ASI. Some were intended to protect Hubbard's money, others to
7 create a buffer between him and the non-profit Church of
8 Scientology so that a legal link could not be made. Some of ASI's
9 responsibilities were subsequently moved to some of those
10 entities, such as the Religious Technology Center.

11 M. Intelligence Functions Assigned To House Counsel To
12 Avoid Recurrence Of The FBI Raid By Creating The Work
13 Product And Attorney Client Privileges As Shields
14 Against Government Inquiries.

15 98. ASI was also the focal point for "intelligence." Since
16 the Intelligence Bureau had been decimated by the FBI raid and the
17 subsequent conviction of the top leadership, what was worked out
18 to prevent this from happening again was to assign the more
19 sensitive work to private investigators and to assign it to the
20 attorneys and to call it an "attorney work product." However this
21 was in name only. Private investigators worked directly with those
22 of us who needed them. I personally directed such work and saw it
23 being directed by others, including Miscavige. As it was explained
24 to me, most of it was billed to the Church of Scientology by the
25 attorney who paid the private investigator, even though he
26 reported directly to us. Therefore, I am familiar how the legal
27 and investigative arms of Scientology came to develop after the
28

1 Guardian's Office was "disbanded."
2

3 N. Assisting Hubbard At Gilman Hot Springs, California.

4 99. At times, Hubbard personally ordered me (via written
5 dispatch, transcribed from a tape) to go to Gilman Hot Springs to
6 handle various situations for him. I went on assignment from Los
7 Angeles on perhaps as many as 70 times. These ranged from the
8 handling of the Golden Era Musicians to the handling of his
9 family. During these many visits, I became intimately familiar
10 with additional duties of the international organization, from
11 music production on to the management of organizations.

12 100. Additionally, ASI went to Gilman Hot Springs every week
13 to prepare packages of information on the operation of Scientology
14 that was secretly shipped to Hubbard who was in hiding. In turn,
15 he sent us orders. This was done by him on tape which was
16 transcribed and then sent out.

17 101. Also while at ASI, I ghosted material for the missing
18 Hubbard. Some of this was read to Scientologists at large meetings
19 as greetings from Hubbard or issued as directives from him,
20 including policy.

21 102. I was also Hubbard's editor for Mission Earth, a
22 one-million-plus word work that was delivered to ASI. I cut it
23 into 10 books, proposed the titles, wrote introductory material
24 and got the works ready for publication.

25 O. Expert Witness About The Church Of Scientology On Behalf
26 Of The Church Of Scientology During The Armstrong Trial.

27 103. In 1984, after Gerry Armstrong was sued by the Church of
28 Scientology, David Miscavige assigned me to do key research into

1 Hubbard's life to refute Armstrong's claims that Hubbard had lied.
2 With a team of full-time people working for nearly two months
3 (compared to Armstrong working by himself), we found additional
4 information to challenge some points Armstrong had made. I was
5 called by the Church of Scientology as their expert researcher to
6 testify as to what had been found.

7 P. Hubbard's Death.

8 104. When Hubbard died in 1986, I was one of perhaps 10
9 people that were selected to go to the location, which was a ranch
10 north of San Luis Obispo, California. We arrived shortly after his
11 death and well before any authorities. Since Scientologists had
12 not been told the truth of Hubbard's deteriorating condition, the
13 task was to quickly create a story that would be acceptable to the
14 media as well as to Scientologists. My area of responsibility was
15 the media that might call and/or show up.

16 105. I stayed at the ranch for months. During that time, I
17 gave interviews to or dealt with the media who called or who
18 showed up at the ranch. I also became good friends with Pat
19 Broeker, who had lived at the ranch with Hubbard and who was the
20 liaison to all Scientology entities and learned more about the
21 Hubbard and the operations of Scientology.

22 106. When there was concern that another secret Hubbard ranch
23 near Barstow might be discovered, I was sent to stay there. I
24 stayed at that location for perhaps another two months.

25 Q. Purged In Power Struggles Following Hubbard's Death.

26 107. A power struggle ensued after Hubbard's death between
27 Broeker and Miscavige that Miscavige won. Since I had been close
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to Broeker, I was caught in the purge and sent to the "Rehabilitation Project Force" (RPF), a Scientology gulag hidden behind an Indian reservation near Hemet. Those on the RPF are kept at hard labor under 24 hour guard until they are "rehabilitated," which means no longer thinking critical thoughts. I escaped down a dry river bed one night but was caught in Hemet. I finally ended up spending 14 months on the RPF, with deteriorating health (confirmed by medical examination.)

108. I was returned to ASI and was assigned the task of producing additional "Ron Mags," a publication that my wife and I had initiated in 1982 that were about Hubbard. When I refused to follow an illegal order, I was physically assaulted and beaten and sent back to Gilman Hot Springs for "handling." Pretending to be better, I went to Los Angeles to see my wife and told her about the situation. Before leaving Los Angeles, I wrote a report about the beating and sent it to OSA attorney Kendrick "Rick" Moxon. We put a few clothes in the car and left on July 3, 1989, leaving the rest of our belongings behind simply because it was not worth the risk to try and retrieve them.

CONCLUSION

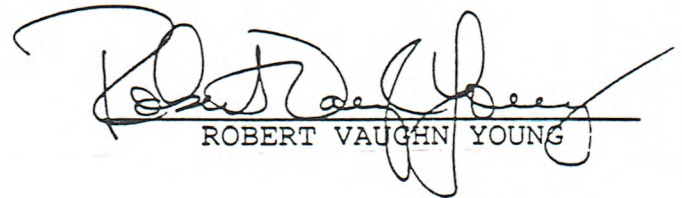
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In short, all Hubbard policies which created Fair Game are still in effect, including Guardian Orders, and will remain in effect as "scriptures" until he changes them. This, of course is impossible because Hubbard died in 1986.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 25 day of October 1993, at Los Angeles California.


ROBERT VAUGHN YOUNG

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 221 North Figueroa Street, Suite 1200, Los Angeles, CA 90012.

On October 26, 1993, I served the foregoing document described as DECLARATION OF ROBERT VAUGHN YOUNG, on interested parties to this action

XX by placing the original XX a true copy thereof enclosed in sealed envelopes addressed as follows:

Jonathan W. Lubell, Esq.
MORRISON, COHEN, SINGER & WEINSTEIN
750 Lexington Avenue
New York, New York 10022

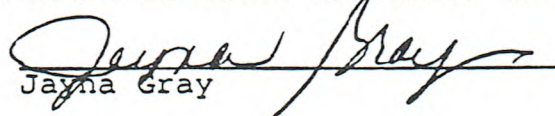
Mr. Steven Fishman
8851 Sunrise Lakes Blvd., #116
Sunrise, Florida 33322-1413

Robert A. Wiener, Esq.
BOWLES & MOXON
6255 Sunset Blvd., #2000
Hollywood, CA 90028

XX BY MAIL I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily" familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

Executed on October 26, 1993, at Los Angeles, California.

XX (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.


Jayna Gray